

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED SOVEREIGN	:	
AMERICANS, INC., BERNARD	:	
SELKER, DIANE HOUSER, RUTH	:	
MOTON <i>and</i> DEAN DREIBELBIS,	:	
Plaintiffs	:	
	:	No. 1:24-CV-01003
v.	:	
	:	Magistrate Judge Bloom
AL SCHMIDT, MICHELLE	:	
HENRY, and MERRICK	:	Electronically Filed Document
GARLAND,	:	
	:	<i>Complaint Filed 06/18/24</i>
Defendants	:	

**ATTORNEY GENERAL HENRY’S MOTION TO DISMISS
PLAINTIFFS’ AMENDED COMPLAINT**

AND NOW comes Defendant, Attorney General Michelle Henry, by and through undersigned counsel, and files this Motion pursuant to Fed. R. Civ. P. 12(b)(6) to dismiss the Plaintiffs’ allegations against her with prejudice. A brief in support of this motion will be filed within the period provided for under Local Rule 7.5.

WHEREFORE, for the reasons further detailed in Defendant’s forthcoming Brief in Support, her Motion should be granted. Defendant has contacted Plaintiffs’ Counsel, who does not concur in this Motion.

Respectfully submitted,

MICHELLE A. HENRY
Attorney General

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Date: September 9, 2024

By: s/ ERICH T. GREINER

ERICH T. GREINER
Deputy Attorney General
Attorney ID PA #331601

NICOLE R. DITOMO
Chief Deputy Attorney General
Civil Litigation Section

Counsel for Attorney General Michelle
Henry

CERTIFICATE OF CONCURRENCE

I, Erich T. Greiner, Deputy Attorney General, hereby certify that I have sought concurrence from Plaintiffs' counsel, and he does not concur in this Motion. I further certify that I have sought the concurrence of counsel for Defendant, Secretary Al Schmidt, who does not oppose the filing of this Motion.

s/ ERICH T. GREINER

ERICH T. GREINER

Deputy Attorney General

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CERTIFICATE OF SERVICE

I, Erich T. Greiner, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General hereby certify that on September 9, 2024, I caused to be served a true and correct copy of the foregoing document titled *Attorney General Henry's Motion to Dismiss Plaintiffs' Complaint* to the following:

VIA ELECTRONIC FILING

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of Election Security and Technology,

Pennsylvania Bureau of Elections,

Pennsylvania Department of State, and Al

Schmidt

s/ ERICH T. GREINER

ERICH T. GREINER

Deputy Attorney General